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| 10 | Attorneys for Defendants CITY AND COUNTY OF SAN FRANCISCO, | |
| 11 | HEATHER FONG, JOHN BURKE, DAN MCD MATHEW NEVES, PHILIP PAPALE, DEPUT | |
| 12 | AND MICHAEL HENNESSEY | |
| 13 | | |
| 14 | UNITED STATES DISTRICT COURT | |
| 15 | NORTHERN DISTRICT OF CALIFORNIA | |
| 16 | ELECIA R. HOLLAND, | Case No. CV-10-2603 TEH |
| 17 | Plaintiff, | CEIDIU ATION AND IDDODOCEDI ODDED |
| 18 | VS. | STIPULATION AND [PROPOSED] ORDER CONTINUING CASE MANAGEMENT CONFERENCE |
| 19 | CITY OF SAN FRANCISCO; COUNTY OF SAN FRANCISCO; CHIEF OF SAN | Currently Scheduled Conf.: June 4, 2012 |
| 20 | FRANCISCO POLÍCE HEATHER FONG; | |
| 21 | SFPD OFFICER JOHN BURKE; SFPD OFFICER DAN MCDONAGH; SFPD | Proposed Continued Conf.: June 18, 2012 |
| 22 | OFFICER MATTHEW NEVES; SFPD OFFICER PHILIP PAPALE, SAN | |
| 23 | FRANCISCO COUNTY SHERIFF MICHAEL HENNESSEY, SFSD DEPUTY | |
| 24 | BARNES and DOES 2-50, AND 52-100, inclusive, | |
| 25 | Defendants. | |
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INTRODUCTION

Plaintiff and Defendants request an order continuing the further case management conference from June 4, 2012 to June 18, 2012, or a date more convenient for the Court, because of a family medical emergency.

RECITALS

- A. Deputy City Attorney Kimberly Bliss is lead counsel for Defendants. Ms. Bliss has been conferring with Plaintiff's counsel Julien Swanson to produce a joint CMC statement and attempt to resolve discovery issues around the strip-search claims. The parties do not agree on the appropriate scope of discovery related to the strip-search claims, but the parties have been conferring in good faith and have made progress toward narrowing the issues in dispute.
- B. On Tuesday, May 22, 2012, Ms. Bliss was unexpectedly called away from work due to a family medical emergency involving her spouse. Ms. Bliss has been out of the office since then. She may return to work next week, but her return date is unknown at this time.
- C. Deputy City Attorney Duncan Carling is also assigned to the case. Mr. Carling will write the CMC statement and represent Defendants at the conference if necessary, but he was unavailable to write the CMC statement by the due date, today, May 25, 2012, due to other work matters.
- D. Defendants have requested, and Plaintiff has agreed, to postpone the case management conference for two weeks, from June 4, 2012, to June 18, 2012, or a subsequent date convenient for the Court. The additional time will allow Defendants to determine if Ms. Bliss will be available to work on the case, and allow Mr. Carling time to prepare the statement if necessary.
- E. The parties have met and conferred on availability for the conference on June 18, 2012. If the Court prefers a date after June 18, 2012, all parties are available on July 2, 2012, and July 16, 2012. Mr. Carling is not available on June 25, 2012, because he is in trial, and he is not available on July 9, 2012, because he is on a pre-planned and pre-paid vacation.

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DECLARATION OF DUNCAN CARLING 1 I am a Deputy City Attorney with the San Francisco City Attorney's Office, counsel for 2 1. Defendants. I am assigned to the case of Holland v. City and County of San Francisco et. al. 3 with co-counsel Kimberly Bliss. I have knowledge of the facts set forth in this declaration 4 based on my role as an attorney of record in this case, and on information and belief from 5 statements made to me by Kimberly Bliss. 6 7 2. Each of the facts recited above is true and correct. 8 3. I am informed and believe that Kimberly Bliss will provide the Court with a declaration if one is required. 9 10 I declare under penalty of perjury under the laws of the United States that the foregoing is true 11 and correct, and that I executed this declaration on May 25, 2012, at San Francisco, California. 12 13 /s/ Duncan Carling **DUNCAN CARLING** 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28

STIPULATION 1 2 Based upon the facts recited above, the parties stipulate to entry of an order continuing the case management conference from June 4, 2012 to June 18, 2012, or a subsequent date more convenient to 3 the Court and counsel. The parties further stipulate that they will file their joint case management 4 conference statement seven days before the conference. 5 SO STIPULATED. 6 7 Dated: May 25, 2012 DENNIS J. HERRERA 8 City Attorney JOANNE HÖEPER 9 Chief Trial Deputy /s/ Duncan Carling 10 BY: **DUNCAN CARLING** 11 Attorneys for Defendants 12 LAW OFFICES OF GERI LYNN GREEN Dated: May 25, 2012 13 /s/ Julien T. Swanson 14 JULIEN T. SWANSON Attorneys For Plaintiff 15 16 17 ORDER 18 Pursuant to the parties' stipulation, the further case management conference currently 19 scheduled for June 4, 2012, at 1:30 p.m. is continued to $\frac{06}{25} \frac{2012}{2012}$ at 1:30 p.m. The parties 20 06/18/2012 shall file their joint case management statement by 21 22 05/29/2012 Dated: 23 nderson lge 24 Judge Thelton E. Henderson 25 26 27

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